

Judge Ann Aiken

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

CASCADIA WILDLANDS et al.,

Plaintiffs,

vs.

CHERYL ADCOCK et al.,

Federal Defendants.

Civ. Case No. 6:22-cv-00767-AA

JOINT PROPOSED CASE SCHEDULE

The parties submit this Joint Proposed Case Schedule in response to the Order dated May 26, 2022. ECF No. 3. In accordance with the provisions of Rule 16(b) of the Federal Rules of Civil Procedure, the parties have conferred, and undersigned counsel for the parties hereby submit their proposed scheduling order below.

I. Nature of the Case

The parties agree that this case is governed by the judicial review provisions of the APA, 5 U.S.C. §§ 701-706. The parties further agree that this case is therefore exempt from initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(B)(i) and from the requirements of Rule 26(f) of the Federal Rules of Civil Procedure.

With regard to Alternative Dispute Resolution, the parties have discussed the possibility of ADR proceedings at a future juncture. In light of this discussion and understanding, the parties request that the ADR Report requirement be waived.

II. Proposed Deadlines

The parties respectfully propose the following deadlines for this matter:

1. Federal Defendants, Chery Adcock et al., will formally lodge with the court the Administrative Record for this action on or before **November 1, 2022**.
2. Any motions to complete or supplement the Administrative Record shall be filed on or before **December 23, 2022**.
3. The following deadlines shall apply:
 - a. Plaintiffs' motion for summary judgment is due on or before **February 3, 2023**.
 - b. Federal Defendant's combined cross-motion for summary judgment and response to Plaintiffs' motion for summary judgment is due on or before **April 7, 2023**.
 - c. Plaintiffs' combined reply in support of their motion for summary judgment and response to Federal Defendant's cross-motion for summary judgment is due on or before **May 5, 2023**.
 - d. Federal Defendant's reply in support of its cross-motion for summary judgment is due on or before **June 2, 2023**.

In light of the complexity of the issues raised in this matter, the parties also respectfully request that the following word limits apply to their summary judgment briefs:

- a. Plaintiffs' opening brief in support: 12,500 words.
- b. Federal Defendant's combined brief in support/response: 14,000 words.
- c. Plaintiffs' combined response/reply: 12,500 words.
- d. Federal Defendant's reply: 11,000 words.

The parties agree not to oppose a motion to extend the word count.

Respectfully submitted this 31st day of August, 2022.

/s/ Marlee Goska

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2022, I electronically filed a Joint Proposed Case Schedule with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants: Sean.Martin@usdoj.gov.

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